

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ANDREAS ALBERTI,

Plaintiffs,

v.

**THE RECTORS AND VISITORS OF THE
UNIVERSITY OF VIRGINIA,**

Defendant.

Case No. 3:21-cv-14-NKM

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADINGS OR MOTIONS**

Defendant The Rectors and Visitors of the University of Virginia (“UVA”), by counsel, moves this Court for an order extending the time to file any responsive pleadings or motions to the Complaint filed by Plaintiff Alberti (“Plaintiff”), to up to and including June 16, 2021. In support of this Motion, UVA states:

1. On April 28, 2021, Plaintiff filed a Complaint claiming UVA violated Plaintiff’s rights under Titles VI and VII of the Civil Rights Act of 1964. (ECF No. 1).
2. Plaintiff was formerly in UVA’s chemical engineering doctoral program. *Id.* ¶ 15.
3. On May 12, 2021, UVA was served with the Complaint.
4. Under Rule 12 of the Federal Rules of Civil Procedure, UVA must respond to the Complaint within 21 days, which falls on June 2, 2021.
5. To respond to the Complaint, counsel for UVA must meet with several UVA faculty concerning the allegations in the Complaint.
6. The school year recently ended and UVA is currently on its summer break, which

impedes UVA's counsel's ability to fully investigate Plaintiff's claims as required to respond to the Complaint.

7. In addition, the current deadline falls two days after the Memorial Day weekend, which also impedes UVA's counsel's ability to meet with any necessary UVA faculty and further, counsel for UVA will be out of the office during this time period.

8. UVA's counsel contacted Plaintiff's counsel seeking additional time to file responsive pleadings or motions.

9. Plaintiff's counsel agreed to a fourteen-day extension of UVA's time by which to file responsive pleadings or motions.

10. Thus, the parties have agreed that UVA shall have up to and including June 16, 2021 to file responsive pleadings or motions.

In light of the parties' agreement and for good cause, UVA, by counsel, moves this Court for an order extending the time for UVA to file responsive pleadings or motions to Plaintiff's Complaint to up to and including June 16, 2021. A proposed order is being filed contemporaneously with this motion.

Respectfully submitted,

/s/ Sandra S. Gregor /s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd of May, 2021, I filed a copy of the foregoing document using the Court's ECM/ECF filing system, which will send an electronic notification of the same (NEF) to counsel of record for the plaintiff.

s/ Sandra S. Gregor /s/
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